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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

.14 JUL 1989

MEMORANDUM

SUBJECT: Revere Copper & Brass Site, Detroit, Michigan, Information Requests

FROM: Thomas J. Kenney *TJK*
Assistant Regional Counsel

TO: Ruth Ann Mancos
Environmental Protection Specialist

Preparation of information requests to various parties connected with the Revere Copper & Brass Site is in order. I have been informed that you are the person who may be responsible for coordinating the preparation of information requests for this Site. I have included a copy of a portion of the final PRP Search Report which provides a list of PRPs for the Site. On the list, I have notated with an asterisk those parties which should be sent information requests. Your attention to this matter is appreciated greatly. If you have any questions or would like to discuss this matter, please do not hesitate to contact me at 3-1027.

The TAT report recommended that the U.S. EPA not undertake a removal action at that time. Rather, the PCB contamination problem should be referred to the current owner, City of Detroit CEDD, which should be held responsible for removal of the capacitors and decontaminating the area (67).

However, in March 1988, the TAT team prepared and submitted to the U.S. EPA a Removal Action Plan for the site. The plan outline procedures and costs involved in removing the capacitors found at the site in November 1987 and remediating the site (87-101).

On March 15, 1988, the U.S. EPA tasked the TAT team to respond to a report of abandoned drums and transformers at the site. Arriving at the site that afternoon, TAT documented three scrap dealers loading two transformer carcasses onto a pickup truck. The on-scene coordinators informed the scrappers that they could not remove the transformer carcasses from the site (102). Unfortunately, the names of the scrappers were not documented.

The TAT team found eleven drums full of PCB oil, and transformer oil spilled on the ground, in addition to the two empty transformer carcasses (102). The contaminated wastes were dumped on the southeast side of the property at the end of an access road leading to the Detroit River (112). Subsequent analyses of the spilled transformer oil indicated total PCB levels of up to 190,000 ppm (103).

On March 17, 1988, the City of Detroit was notified by the U.S. EPA that the PCB contamination at the site was an immediate threat to the public and gave the City the option to remedy the problem if it could be done in a timely manner. The notification was telephoned to the Corporation Counsel's Office of the City Detroit. A transcript of the notification was prepared by Mary A. Gade of the U.S. EPA and sent certified mail to Don Pailen, Corporation Counsel, City of Detroit (127-129).

Due to the inability of the City of Detroit to respond to this matter quickly, the U.S. EPA initiated an emergency removal action on March 18, 1988 (104-126). The emergency removal action involved the disposal and/or incineration of the drums, two transformers, PCB oil and contaminated soil resulting from the illegal dumping of these units (106). In addition, 45 capacitors containing PCB oil were removed from the equipment pits of the building and disposed of (115). These capacitors are the same that were found during the November 1988 TAT sampling. The removal action was completed on April 27, 1988.

Potentially Responsible Parties

(*) City of Detroit
Community and Economic Development Department
150 Michigan Avenue
Detroit, Michigan 48226
(313) 224-2560

Owner

Standard

The City of Detroit acquired the property from RCP in 1985 and is the current owner (29). Unrestricted access to the property during the City's ownership promoted illegal dumping of PCB transformers and copper scavenging of PCB capacitors (102, 67).



Revere Copper Products, Inc.
P.O. Box 300
Rome, New York 13440
(315) 338-2022

Owner/Operator

Standard

RCP is a subsidiary of RCB and obtained ownership of the property from RCB in 1980 (138, 16). During RCP's ownership of the property, an inspection of PCB storage areas revealed that transformers and capacitors were leaking PCBs on the ground in violation of EPA's PCB storage regulations (54). RCP reportedly sold all of their PCB transformers and capacitors to MacMillan Machinery Co. around late 1981 to early 1982 (50).



Revere Copper and Brass Inc.
P.O. Box 10327
High Ridge Park
Stamford, Connecticut 06904
(203) 358-3500

Owner/Operator

Standard

Registered Agent (137):

Corporation Trust Company
Corporation Trust Center
1209 Orange Street
Wilmington, Delaware 19801
(302) 658-7581

Parent Company (135):

Ocwen Financial Group
515 North Flagler Drive
North Bridge Tower I
Suite 600
West Palm Beach, Florida 33401
(407) 832-2221

RCB was the owner and operator of the facility from 1928 through 1980, when the property was relinquished to its subsidiary, RCP (4, 174, 16). RCB reportedly obtained scrap copper from Carter Industrials (45). It is likely that Carter's scrap copper was contaminated with PCBs when shipped to RCB. RCB's total assets are listed as \$274,000,000 with a net worth of \$82,000,000 (138). A secretary of Revere Ware in Clinton, Illinois indicated that Ocwen Financial Group is the parent company of RCB and that all inquiries to RCB should be addressed to Ocwen (135).

Detroit Lumber Company

Owner

Registered Agent (350):

**James H. Loprete
1700 North Woodward
Suite A
P.O. Box 587
Bloomfield Hills, Michigan 48013
(313) 642-5770**

**Detroit Trust Co. as trustee
of Thomas E. Reeder's estate
(no listing found)**

**Elise L. Sheldon
(no listing found)**

**Margaret Moreland
(no listing found)**

Detroit Lumber Company transferred ownership of the eastern portion of the site property to RCB in 1950 (6). The Detroit Trust Co., as trustee of Thomas E. Reeder's estate, Elise L. Sheldon, and Margaret Moreland apparently had an interest in Detroit Lumber Company. All three parties quit claim their interests in the Detroit Lumber Company property to RCB in 1951 (8, 12, 14).

**Michigan Copper and Brass Company
5851 West Jefferson Avenue
Detroit, Michigan**

Owner

Michigan Copper and Brass Company sold the western portion of the site property to RCB in 1928 (4). All the buildings on the property were included in this transaction (42). Michigan Copper and Brass Company dissolved as a corporation in Michigan on June 29, 1929 (351).

Michigan Central Railroad

Owner

Present Owner (136):

**Consolidated Rail Corporation.
(Conrail)
6 Penn Center Plaza
Philadelphia, Pennsylvania 19103
(215) 596-2000**

Michigan Central Railroad maintains their right-of-ways, three railroad sidings, on the RCB property (25, 39). Michigan Central Railroad reportedly merged to New York Central, which emerged to Penn Central, which merged to Consolidated Rail Corporation, which now owns the tracks (136).



MacMillan Machinery Company, Inc.
125 Lindley Street
Bridgeport, Connecticut 06608
(203) 367-5301

Generator

MacMillan Machinery Company reportedly bought all of the equipment in the plant's buildings from RCP in 1981 or 1982 (50). The equipment cited includes approximately 100 PCB capacitors, eight PCB transformers, and thirty six non-PCB transformers. MacMillan sold the "copper" in the plant to Continental Aluminum. The "copper" apparently included only the transformers and not the capacitors which were left at the site when the City of Detroit obtained ownership (64, 106).



Continental Aluminum
1610 Algonquin Street
Detroit, Michigan 48215
(313) 823-5800

Generator

Continental Aluminum reportedly bought all of the "copper" in the plant as a "package" from MacMillan Machinery Company (50). In 1983, Mr. Strobel, president of Continental, removed eight PCB transformers from the site to salvage the copper inside. Thirty six non-PCB transformers and approximately 100 PCB capacitors were left on the site (50). The 1987 MDNR inspection noted that only PCB capacitors were found at the site. All of the transformers had apparently been removed (64, 106).



Carter Industrials, Inc.
4690 Humboldt Avenue
Detroit, Michigan 48208
(no telephone number listed)

Generator

Carter Industrials reportedly supplied RCB with scrap copper to be used at the RCB facility to fabricate copper cakes (45). Carter obtained their scrap copper by disassembling PCB transformers and capacitors. It is very likely that scrap copper sent to RCB was contaminated with PCBs. The Carter Industrials property was recently included on the NPL for its gross PCB contamination.